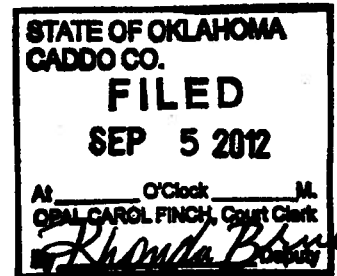


IN THE DISTRICT COURT OF CADDO COUNTY
STATE OF OKLAHOMA



Veronica Bowen,)
)
Plaintiff,)
)
vs.)
)
Travelers Commercial Insurance Company,)
a foreign corporation,)
)
Defendant.)

Court # CJ-2012- 103

PETITION FOR DAMAGES

COMES NOW the Plaintiff, Veronica Bowen, by and through her attorneys, Randy Wagner and Jennifer Liggett, and would specifically state the following in support of her petition for damages:

1. That the Plaintiff, Veronica Bowen, hereinafter referred to as "Bowen", is a resident of Caddo County.
2. That the Defendant, Travelers Commercial Insurance Company, hereinafter referred to as "Travelers" is a foreign corporation doing business within the confines of the State of Oklahoma.
3. That the insurance contract entered into between the parties for uninsured motorists coverage for Bowen's automobile occurred in the State of Oklahoma.
4. That on or about January 24, 2012, Bowen was involved in a motor vehicle accident with an unidentified vehicle in Oklahoma City, Oklahoma in which she sustained personal injury. As a result of said injury, she has incurred reasonable and necessary medical expenses, pain and suffering, and permanent impairment from injuries sustained in said accident.



5. That at the time of the accident, Bowen had contracted with Travelers for under/uninsured payments coverage on her automobile involved in the accident. Said limits of coverage is a total of twenty-five thousand dollars (\$ 25,000.00).

6. That Bowen has placed Travelers on demand for the uninsured motorist benefits.

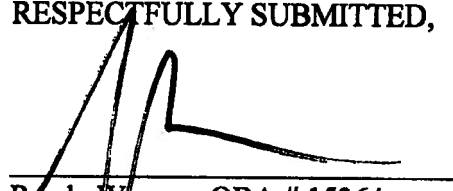
7. That Travelers has denied the claim as Petitioner's negligence as she took faulty evasive action. Travelers has not cited any statutory reference for any traffic law broken by Bowen.

8. That Travelers has failed to properly investigate said claim.

9. That Travelers has not dealt with Bowen in good faith or dealt with her fairly and failed to properly evaluate this claim. As a result Plaintiff has suffered physical, emotional, and financial distress.

WHEREFOR PREMISES CONSIDERED, Plaintiff respectfully requests actual damages in the amount of twenty-five thousand dollars (\$25,000.00) punitive damages, costs, interest, and any other relief deemed appropriate by the Court.

RESPECTFULLY SUBMITTED,



Randy Wagner, OBA # 15364
Jennifer Liggett, OBA # 19863
118 E. Randolph
Enid, OK 73701

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E-Mail: Randy@oklalaw.com

Jennifer@oklalaw.com

ATTORNEYS FOR THE PLAINTIFF

VERIFICATION

State of Oklahoma, County of Garfield, ss:

Veronica Bowen, of lawful age and being first duly sworn upon oath, states: I am Veronica Bowen, Petitioner above named. I have read the foregoing instrument and state that all statements contained therein are true and correct according to my best information and belief.

Veronica L. Bowen
Veronica Bowen, Petitioner

~~Subscribed and sworn to before me on August 30, 2012, by Veronica Bowen, Petitioner above named.~~

My Commission Expires:

3-7-15
Comm. # 03001374

Tina Bode
Notary Public

